From: Stuber, Robyn
To: Webb, Steven J.@Waterboards; Mitschele, Becky
Cc: Morris, Cris@Waterboards
Subject: RE: Hyperion Toxicity Limits CI-1492
Date: Monday, April 27, 2015 12:55:00 PM

Hi Steven,

Good question. I need to look at my notes for Hyperion (in my SF office) because this question has come up before, but … off the top of my head … I'd say that their current IWC should be what's used for the TST IWC. I'll check back with you on Wednesday, when I have more time in the office.

Robyn

ROBYN A. STUBER ● (415) 972-3524
U.S. EPA REGION 9 ● NPDES PERMITS SECTION (WTR-2-3)
75 HAWTHORNE STREET ● SAN FRANCISCO, CA 94105

From: Webb, Steven J.@Waterboards [mailto:Steven.Webb@Waterboards.ca.gov]
Sent: Wednesday, April 22, 2015 3:05 PM
To: Stuber, Robyn; Mitschele, Becky
Cc: Morris, Cris@Waterboards
Subject: Hyperion Toxicity Limits CI-1492

Hi Robyn –

The City of Los Angeles is trying to determine what their toxicity limit is in the current NPDES permit for Hyperion and it appears to me that the permit is inconsistent. Since the EPA jointly issues the Hyperion NPDES permits with the Regional Water Board, I wanted to get some direction from you pertaining to the chronic toxicity limits. Are the toxicity limits supposed to be equal to the dilution credit or is it supposed to be equal to one plus the dilution credit? Using the equation in the Ocean Plan (Ce=Co + Dm(Co-Cs)), I come up with a permit limit of dilution credit plus one since the criteria is 1 TUc. Also, shouldn't the IWC be equal to 100/TUc?

The NPDES Order No. R4-2010-0200 gives chronic toxicity final effluent limitations for outfall 001 and 002 (13 and 84, respectively). It also appears that the dilution credit for outfalls 001 and 002 are 13 and 84, respectively. Shouldn't these limits actually be 14 and 85 TUc?

In addition, on page E-21 of the MRP, it states:

"The chronic IWCs for Discharge Points 001 and 002 are 7.1% and 1.1% effluent, respectively. 7.1% is the result of 1 divided by 14, which is sum of dilution credit 13 plus 1. 1.1% is the result of 1 divided by 85, which is sum of dilution credit 84 plus 1. The acute IWC for Discharge Point 002 is 35.7% effluent."

This section of the MRP seems to be correct, but there is a letter (see attached) that changes this

part of the MRP to:

"The chronic IWCs for Discharge Points 001 and 002 are 7.1% and 1.1% effluent, respectively. 7.1% is the result of 1 divided by 14, which is sum of dilution credit 13 plus 1. 1.19% is the result of 1 divided by 84, which is the daily maximum effluent limit. The acute IWC for Discharge Point 002 is 35.7% effluent."

This change is not consistent with the methodology used to calculate the limit for outfall 001. If this change was appropriate, shouldn't the IWC for outfall 001 be 100/13 since 13 is the final effluent limitation?

I have requested the dilution study including the approved dilution credits from the City of LA to confirm what the dilution credits should be, but it appears 13 and 84 are the dilution credits approved in the permit. Please let me know if you have any questions. Thank you for your help!

Steven Webb
Water Resource Control Engineer
Regional Water Quality Control Board
320 W 4th Street, Suite 200
Los Angeles, CA 90013
(213) 576-6793
Steven.Webb@Waterboards.ca.gov